

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
702.382.2101

FRANK M. FLANSBURG III, ESQ., Nevada Bar No. 6974  
[fflansburg@bhfs.com](mailto:fflansburg@bhfs.com)  
MAXIMILIEN D. FETAZ, ESQ., Nevada Bar No. 12737  
[mfetaz@bhfs.com](mailto:mfetaz@bhfs.com)  
EMILY L. DYER, ESQ., Nevada Bar No. 14512  
[edyer@bhfs.com](mailto:edyer@bhfs.com)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
Telephone: 702.382.2101  
Facsimile: 702.382.8135

AARON F. MINER, ESQ. (*pro hac vice*)  
[Aaron.Miner@arnoldporter.com](mailto:Aaron.Miner@arnoldporter.com)  
SASHA ZHENG, ESQ. (*pro hac vice*)  
[Sasha.Zheng@arnoldporter.com](mailto:Sasha.Zheng@arnoldporter.com)  
ANDREW C. JOHNSON, ESQ. (*pro hac vice*)  
[Andrew.Johnson@arnoldporter.com](mailto:Andrew.Johnson@arnoldporter.com)  
KELLEY CHANGFONG-HAGEN, ESQ. (*pro hac vice*)  
[Kelley.Changfong-Hagen@arnoldporter.com](mailto:Kelley.Changfong-Hagen@arnoldporter.com)  
AIDAN MULRY, ESQ. (*pro hac vice*)  
[Aidan.Mulry@arnoldporter.com](mailto:Aidan.Mulry@arnoldporter.com)  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, NY 10019-9710  
Telephone: 212.836.7811

*Attorneys for Plaintiff HF Foods Group, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HF FOODS GROUP INC., a Delaware  
corporation,

Plaintiff,

v.

MAODONG XU; ZHOU MIN NI; FAI  
LAM, in his capacity as Trustee of THE  
IRREVOCABLE TRUST FOR  
RAYMOND NI; WEIHUI KWOK; and  
YUANYUAN WU,

Defendants.

CASE NO.: 2:23-cv-00748-GMN-DJA

**STIPULATION AND ORDER TO EXTEND  
DEADLINE TO ANSWER OR RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff HF Foods Group Inc. ("Plaintiff"), through its counsel of record Brownstein Hyatt Farber Schreck and Arnold & Porter Kaye Scholer LLP; Defendants Zhou Min Ni ("Mr. Ni") and Fai Lam, in his capacity as

1 Trustee of The Irrevocable Trust for Raymond Ni (“Mr. Lam”), Weihui Kwok (“Mr. Kwok”), and  
2 Maodong Xu (“Mr. Xu”) (collectively, the “Defendants”), through their counsel of record, Sklar  
3 Williams, PLLC, as follows:

4 1. On May 11, 2023, Plaintiff filed its Complaint for Damages and Declaratory and  
5 Injunctive Relief for Violations of Federal Securities Laws against Defendants. ECF 2.

6 2. On or about May 15, 2023, Plaintiff served the Summons and Complaint on Mr. Ni.  
7 ECF 41.

8 3. On or about May 16, 2023, Plaintiff served the Summons and Complaint on Mr.  
9 Kwok. ECF 38.

10 4. On or about May 27, 2023, Plaintiff served the Summons and Complaint on Mr.  
11 Lam. ECF 43.

12 5. On June 5, 2023, Mr. Lam, Mr. Kwok, and Defendant Yuanyuan Wu moved for a  
13 30-day extension to respond to the Complaint, which the Court granted. ECF 44-45.

14 6. On or about June 9, 2023, Plaintiff served the Summons and Complaint on Mr. Xu.  
15 ECF 46.

16 7. Thereafter, the Parties expressed a mutual desire to engage in good faith settlement  
17 discussions.

18 8. Certain Defendants have changed counsel and retained counsel, necessitating  
19 additional time to respond to the Complaint, which Plaintiff has accommodated.

20 9. Pursuant to LR IA 6-1(a), the Parties wish to extend the deadline for Defendants to  
21 respond to the Complaint by approximately 60 days in order to further the Parties’ settlement  
22 discussions and to coordinate Defendants’ response deadline should the Parties not settle.

23 10. No discovery deadlines or dates for trial have been set.

24 11. Accordingly, the Parties stipulate and agree that Defendants shall have up to and  
25 including October 10, 2023 within which to file their responses to Plaintiff’s Complaint.

26 12. This stipulation is brought in good faith by the parties and not for purposes of delay.  
27  
28

13. This is the Parties' first request to extend Defendants' response deadline.<sup>1</sup>

**IT IS SO STIPULATED.**

DATED this 11<sup>th</sup> day of August 2023.

DATED this 11<sup>th</sup> day of August 2023.

**BROWNSTEIN HYATT  
FARBER SCHRECK, LLP**

**SKLAR WILLIAMS, PLLC**

By: /s/ Frank M. Flansburg III  
FRANK M. FLANSBURG III, ESQ.  
MAXIMILIEN D. FETAZ, ESQ.  
EMILY L. DYER, ESQ.

By: /s/ Stephen R. Hackett, Esq.  
STEPHEN R. HACKETT, ESQ.  
Nevada Bar No. 5010  
[shackett@sklar-law.com](mailto:shackett@sklar-law.com)  
410 S. Rampart Blvd., Suite 350  
Las Vegas, NV 89144  
Telephone: 702.360.6000  
Facsimile: 702.360.0000

**ARNOLD & PORTER KAYE  
SCHOLER LLP**  
AARON F. MINER, ESQ.  
(*pro hac vice*)  
SASHA ZHENG, ESQ.  
(*pro hac vice*)  
ANDREW C. JOHNSON, ESQ.  
(*pro hac vice*)  
KELLEY CHANGFONG-HAGEN, ESQ.  
(*pro hac vice*)  
AIDAN MULRY, ESQ.  
(*pro hac vice*)

*Attorney for Defendants Zhou Min Ni; Fai  
Lam, in his capacity as Trustee of The  
Irrevocable Trust for Raymond Ni; Weihui  
Kwok; and Maodong Xu*

*Attorneys for Plaintiff HF Foods Group, Inc.*

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: August 14, 2023

<sup>1</sup> This is the second request to extend the deadline for Mr. Lam and Mr. Kwok to respond to the Complaint. Plaintiff and Mr. Lam, Mr. Kwok, and Defendant Yuanyuan Wu filed a stipulation to extend the deadline to answer the Complaint on June 14, 2023 (ECF 47), which was denied without prejudice for failing to state the reason for the requested extension under LR IA 6-1(a). ECF 48.